

# **EXHIBIT A**



Consumer Financial  
Protection Bureau

1700 G Street NW, Washington, D.C. 20552

April 11, 2024

Clover Management Inc.  
ATTN: Teia Bui  
348 Harris Hill Road  
Williamsville, NY 14221  
[tbui@clovergroupinc.com](mailto:tbui@clovergroupinc.com)  
VIA EMAIL

Re: Preliminary Injunction Issued in CFPB, et al. v. Stratfs, LLC, et al.  
Case No. 1:24-cv-00040-AW-MJR (W.D.N.Y.)

Dear Recipient:

On January 11, 2024, the U.S. District Court for the Western District of New York issued a Temporary Restraining Order with An Asset Freeze, Appointment of a Receiver, and Other Equitable Relief. The Court has now entered the attached Preliminary Injunction (Order) that continues the asset freeze until the court enters a final judgment in the case. **The Order freezes the assets of the following defendants, known collectively as the Asset-Freeze Defendants:**

- Stratfs, LLC, formerly known as Strategic Financial Solutions, LLC; DE File No. 4882490; EIN 27-4358425
- Strategic Client Support, LLC, formerly known as Pioneer Client Services, LLC; DE File No. 5292134; EIN 80-0903056
- Strategic CS, LLC; DE File No. 5325573; EIN 46-2683176
- Strategic FS Buffalo, LLC; DE File No. 6362333; EIN 80-1073912
- Strategic NYC, LLC; DE File No. 6445682; EIN 82-1887001
- BCF Capital, LLC; DE File No. 5113231; EIN 46-1871650
- T Fin, LLC; DE File No. 5614487; EIN 47-2182497
- Strategic Consulting, LLC, formerly known as Consult America, LLC; DE File No. 5205164; EIN 90-0910303
- Versara Lending, LLC; DE File No. 5056522; EIN 80-0764680
- Strategic Family, Inc.; DE File No. 6598397; EIN 82-3952605

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- CS 1 PAAS Services, LLC, formerly known as Anchor Client Services, LLC; DE File No. 5928573; EIN 81-1028321
- Bedrock Client Services, LLC, formerly known as HCS, LLC; DE File No. 5616890; EIN 47-2181400
- Boulder Client Services, LLC; DE File No. 5928575; EIN 81-1019105
- Canyon Client Services, LLC; DE File No. 6721779; EIN 82-4140170
- Carolina Client Services, LLC; DE File No. 6850543; EIN 82-5331499
- Great Lakes Client Services, LLC; DE File No. 6850547; EIN 35-2626756
- Guidestone Client Services, LLC; DE File No. 4119608
- Harbor Client Services, LLC; DE File No. 5616892; EIN 47-2194714
- Heartland Client Services, LLC; DE File No. 6930204; EIN 83-0960432
- CS 2 PAAS Services, LLC, formerly known as Monarch Client Services, LLC; DE File No. 7670700; EIN 83-3113957
- Newport Client Services, LLC; DE File No. 7967510; EIN 85-1045678
- Northstar Client Services, LLC; DE File No. 7670699; EIN 83-3671023
- Option 1 Client Services, LLC; DE File No. 7670697; EIN 83-3506156
- Pioneer Client Servicing, LLC; DE File No. 5703748; EIN 47-3442448
- Rockwell Client Services, LLC; DE File No. 6506358; EIN 82-2499028
- Royal Client Services, LLC; DE File No. 6294784; EIN 81-5121700
- Stonepoint Client Services, LLC; DE File No. 6506360; EIN 82-2554007
- CS 3 PAAS Services, LLC, formerly known as Summit Client Services, LLC; DE File No. 6850539; EIN 32-0565772
- Whitestone Client Services, LLC; DE File No. 7051827; EIN 82-1927352
- Ryan Sasson; SSN XXX-XX-1514; DOB 05/31/1978
- Jason Blust; SSN XXX-XX-0446; DOB 04/21/1976
- Daniel Blumkin; SSN XXX-XX-5740; DOB 06/20/1979
- Albert Ian Behar; SSN XXX-XX-1767; DOB 01/30/1965
- Strategic Employee Stock Ownership Plan, also known as Strategic ESOP; EIN 82-6826333
- Strategic Employee Stock Ownership Trust, also known as Strategic ESOT; EIN 82-6826333
- Twist Financial, LLC; DE File No. 4772679; EIN 27-1586339

- Duke Enterprises, LLC; DE File No. 5429516; EIN 27-1586193
- Blaise Investments, LLC; DE File No. 4772676; EIN 27-1586132
- Donald J. Holmgren as Trustee of the Blust Family Irrevocable Trust (also known as Blust Family 2019 Irrevocable Trust UTS 12/19/19); TIN 36-7742901
- Jaclyn Blust; SSN XXX-XX-4882; DOB 01/17/1978
- Lit Def Strategies, LLC; IL File No. 08354502; EIN 84-4046701
- Relialit, LLC; IL File No. 07550936; EIN 83-3412293

We believe one or more of the above defendants may have accounts held by your institution.

Section III of the Order requires a financial institution, brokerage institution, or other entity that is holding assets on behalf of these defendants and served with the Order to, among other things:

- A. Hold, retain within its control, and prohibit Asset-Freeze Defendants from withdrawing, removing, assigning, transferring, pledging, encumbering, disbursing, dissipating, converting, selling, gifting, or otherwise disposing of any accounts, Assets, funds, or other property that are owned by, held in the name of for the benefit of, or otherwise controlled directly by, directly or indirectly, any Asset-Freeze Defendant, in whole or in part, except as directed by further order of the Court or as directed in writing by the Receiver; and
- B. Deny the Asset-Freeze Defendants access to any safe deposit box, commercial mail box, or storage facility that is titled in the name of any Asset-Freeze Defendant, individually or jointly, or subject to access by any Asset-Freeze Defendant, whether directly or indirectly.

Please refer to the Order for your exact obligations.

**The Order requires you to provide Bureau counsel with a certified statement containing certain information about each asset held by or for the benefit of any defendant within three (3) business days of receipt of the Order.**

Please take all steps necessary to prevent any deletion, destruction, or modification of e-mails (sent to or from the defendants), accounting software, and any website-related, database-related, or other content or documents. This request pertains to all such documents, e-mails, or other records that are in existence today and all such future documents and e-mails. The Bureau will promptly inform your company of any change regarding this request.

If you have any questions concerning the Order, please contact Vanessa Buchko at (202) 435-9593 or [Vanessa.Buchko@cfpb.gov](mailto:Vanessa.Buchko@cfpb.gov). If, after a thorough search of your records, you find that you do not have any accounts or assets titled in the name of or controlled (directly or indirectly) by these defendants, please send a sworn statement to that effect via email. Thank you for your cooperation.

Sincerely,

*/s/ Vanessa Buchko*

Vanessa Buchko  
Senior Litigation Counsel  
Consumer Financial Protection Bureau

Attachment